

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
(NORTHERN DIVISION)**

IN RE TITANIUM DIOXIDE ANTITRUST
LITIGATION

Master Docket No.: 1:10-CV-00318-RDB

THIS DOCUMENT RELATES TO:
All Actions

**DEFENDANT THE NATIONAL TITANIUM DIOXIDE COMPANY LIMITED'S
MOTION TO DISMISS FOR INSUFFICIENT SERVICE OF PROCESS AND
LACK OF PERSONAL JURISDICTION**

Defendant The National Titanium Dioxide Company Limited (d/b/a/ Cristal)
("Cristal"), appearing specially for purposes of this Motion only and despite its
contention that it has not been properly served in this matter, respectfully moves the
Court for an order dismissing the Consolidated Complaint against Defendant Cristal for
insufficient service of process pursuant to Rule 12(b)(5), Federal Rules of Civil
Procedure, and for lack of personal jurisdiction pursuant to Fed. R. Civ. P. 12(b)(2).

In support of its motion, Cristal submits the accompanying Memorandum of
Points and Authorities, the Declaration of John E. Hall, and such further evidence and
argument as the Court may permit.

Pursuant to Local Rule 105(6), Cristal also hereby respectfully requests a hearing on its Motion to Dismiss for Insufficient Service of Process and Lack of Personal Jurisdiction.

Dated: June 18, 2010

Respectfully submitted,

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By: /s/
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